

### REMARKS

The Office Action of April 2, 2003 has been carefully considered.

Claims 1-16 and 36-41 have been rejected under 35 USC 112, 1<sup>st</sup> paragraph, on the basis that it is not clear from the specification under what conditions the concentration of the release product composition will be increased or decreased.

In response, Applicants note that the invention is essentially an improvement on a process known in the art. Thus, US 4,501,315, cited on page 2 of the present specification, discloses measuring the torque of the rolls to regulate the amount of release agent to be applied, while US 4,892,113, also cited on page 2 of the application, uses laser measurement of the surface of the rolls to regulate the amount of release product sprayed onto the rolls.

Moreover, US 5,353,861 (Roder et al), cited in the Office Action of April 2, 2003, detects strip movements in the region between the roll nip and the first deflector roll in a direction perpendicular to the strip surface as an indication of sticking, to alter process parameters before damage is caused. Among the process parameters which may be altered is the amount of release agent applied to the rolls.

In the present specification, it is disclosed at page 14, line 20 through page 15, line 6, that the amount of release

agent on the rolls may be determined by various sensors, or the condition of the machine may be measured by various sensors, in order to regulate the composition of the release product applied to the rolls.

Given that it is well known in the art to measure process parameters and to vary the *amount* of release product applied to the rolls, Applicants submit that one of ordinary skill in the art could carry out the invention without undue experimentation, by adjusting the composition of the release product rather than the amount, while maintaining a uniform distribution of the product on the rolls. Thus, where the prior art would increase the volume of release product applied, the invention teaches instead increasing the concentration of release agent in the release product, while maintaining a uniform distribution of release product on the rolls.

Withdrawal of this rejection is requested.

Claims 1-16 and 36-41 have been rejected under 35 USC 112, 2<sup>nd</sup> paragraph, as being indefinite in the manner in which the claims have been written. These claims have now been canceled and replaced by a set of claims written in proper form for US practice, and withdrawal of this rejection is requested.

Claims 1, 4-16 and 36-41 have been rejected under 35 USC

103 over Roder et al, while claims 1-16 and 36-41 have been rejected under 35 USC 103 over the admitted prior art in view of Roder et al.

Applicants have admitted that it is well known the adjust the amount of release product applied to rolls in twin roll casting based on measured parameters. The invention is based on an improvement to this process, adjusting the composition of the release product to increase or decrease the amount of release agent therein, *while maintaining a uniform distribution of release product on the surface of the rolls.* Applicants have discovered that if the distribution is not maintained uniform, the effectiveness of the coating varies in an uncontrolled manner, particularly with regard to the stability of the casting machine and the quality of the strip; see page 4, lines 1-18 of the specification.

The question is thus whether Roder et al discloses or suggests varying the amount of release agent in the release product. The Office Action notes that Roder et al discloses adjusting the "concentration" of the release product, but taken in context, it is not clear that this means adjusting the composition:

According to a first variant, when vibrations appear in the cast strip, triggered by the process electronics, a parting agent is sprayed on to the surface of at least one casting roll. If a parting agent is already applied during the normal roll casting process, the concentration and thus the layer thickness applied can be increased when vibrations

appear. A dressing, preferably a graphite suspension, is preferably applied in the manner known per se with the aid of spray nozzles. (col. 2, line 66-col. 3, line 6)

Applicants believe that the term "concentration" is not properly used in the above paragraph, because there is no other disclosure in the specification that suggests that the concentration of the release agent in the release product is being adjusted. Indeed, the prior art to Roder et al teaches varying the amount of release product, and Applicants believe that varying the concentration of release agent is a major departure from the practice of the prior art. In the absence of further explanation by Roder et al, Applicants believe that one of ordinary skill in the art would read Roder et al as teaching varying the amount of release product, which is the widely used method for preventing sticking. Moreover, the claims of Roder et al do not mention varying either amount or concentration of release product, and Applicants submit that Roder et al, in this respect, is simply teaching carrying out the prior art method, to vary the amount of release product.

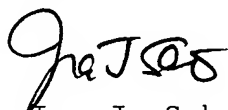
As Roder et al does not disclose or suggest increasing or decreasing the amount of release agent in the release product while maintaining a uniform distribution of release product on the rolls, withdrawal of these rejections is requested.

The abstract has been amended to delete the reference to the figure, and the specification has been amended to use

proper subject matter headings.

In view of the foregoing amendments and remarks,  
Applicants submit that the present application is now in  
condition for allowance. An early allowance of the  
application with amended claims is earnestly solicited.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Ira J. Schultz', with a stylized flourish at the end.

Ira J. Schultz  
Registration No. 28666

APPENDIX

IN THE SPECIFICATION:

Page 1, line 7, Description of related [Prior] art.

Page 2, delete line 18;

line 30, Summary [Description] of the invention.

Page 4, between lines 26 and 27, insert: --Brief  
description of the drawings--.